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# UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

IN RE:	) Case No. 16-11230-SAI	Н
PostRock Energy Corporation, et al. <sup>1</sup>	)	
Debtors.	) Chapter 7	
	)	
	) Jointly Administered	
	)	

# AMENDED INTERIM APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES OF J.P. DICK AND PINNACLE SERVICES, LLC AND NOTICE OF OPPORTUNITY FOR HEARING

## **NOTICE OF OPPORTUNITY FOR HEARING**

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 21 days from the date of filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who a required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The 21 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).

Stephen J. Moriarty as Trustee ("Trustee") for PostRock Energy Corporation, PostRock Energy Services Corporation, PostRock Holdco, LLC, PostRock Eastern Production, LLC, PostRock MidContinent Production, LLC, and STP Newco, Inc. (collectively the "Debtors")

The Debtors in these chapter 11 cases include: PostRock Energy Corporation, PostRock Energy Services Corporation, PostRock Holdco, LLC, PostRock Eastern Production, LLC, PostRock MidContinent Production, LLC, and STP Newco, Inc.

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files this INTERIM APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES OF J.P. DICK AND PINNACLE SERVICES. LLC (the "Application"), pursuant to this Court's ORDER AUTHORIZING EMPLOYMENT OF J.P. DICK AND PINNACLE SERVICES, LLC [Dkt. 565], seeking approval of the payment of fees and expenses incurred for the period from March 5, 2019 through October 16, 2019, and in support thereof would respectfully show the Court as follows:

#### **BACKGROUND**

- 1. On April 1, 2016 (the "Petition Date") the Debtors each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). The bankruptcy estates created by the commencement of the above-styled and numbered bankruptcy cases (collectively, the "Cases") are referred to herein collectively as the "Estates."
- 2. On March 20, 2019 this Court entered an order authorizing the employment of J.P.Dick and Pinnacle Services, LLC (collectively, "Applicant") to provide consulting services to the Trustee regarding PostRock's oil and gas properties and valuation issues [Dkt. 565].

#### **JURISDICTION**

3. This Court has jurisdiction over the subject matter of this Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The relief requested in this Application is authorized under 11 U.S.C. §§ 105(a) and 331.

#### APPLICATION FOR APPROVAL OF COMPENSATION

4. By this Application, the Trustee seeks entry of an order allowing payment of compensation and reimbursement to Applicant whose services have been authorized by this Court.

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5. The detailed time and expense records are attached hereto as Exhibit "A." Fees of \$30,731.25 were incurred for the period covered by the Application. Based on the 173.40 hours billed for the period, the blended hourly rate is \$168.30.

- 6. In addition, Applicant seeks reimbursement of expenses of \$129.00.
- 7. All fees and expenses incurred were reasonable and necessary for the Trustee in the discharge of his duties and responsibilities.

WHEREFORE, the Trustee respectfully prays that the Court enter an order approving the compensation of professionals as set forth herein and for such other and further relief as is just and equitable.

/s/ Stephen J. Moriarty\_

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ATTORNEYS FOR TRUSTEE

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 5, 2019, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to all registered participants.

This is to certify that a true and correct copy of the foregoing was mailed via first-class mail on the 5<sup>th</sup> day of November, 2019, to the following:

BBVA Compass PO Box 4444 Houston Texas 77210-4444 Black Land Mgmt Inc PO Box 38 Bowden WV 26254 Cawley Gillespie & Assoc Inc 306 W 7<sup>th</sup> Street Suite 302 Fort Worth TX 76102-4987 Case: 16-11230 Doc: 601 Filed: 11/06/19 Page: 4 of 5

CDW Direct LLC PO Box 75723 Chicago Illinois 60675-5723	Chandler Oil LLC PO Box 564 Chanute KS 66720	Kansas Dept of Revenue 915 SW Harrison Room 150 Topeka KS 66612-2003
Nalco Champion PO Box 730005 Dallas Texas 75373-0005	OneWest Bank FSB 888 E Walnut Street Pasadena CA 91101	Pitney Bowes Global c/o Bankruptcy Dept PO Box 371887 Pittsburg PA 15250-7887
Sunrise Oilfield Supply Inc 105 S Broadway Ste 610 Wichita KS 67202	Texas Capital Bank, N.A. 2000 McKinney Avenue Ste 700 Dallas TX 75201	Topsource, LLC PO Box 337 Rapid City MI 49676
Transtex Hunter LLC 909 Lake Carolyn Pkwy Ste 600 Irving TX 75039	Transzap, Inc. PO Box 123597 Denver CO 75312-3597	US Attorney WDOK 210 West Park Avenue Ste 400 Oklahoma City OK 73102
Oklahoma Employment Security Commission PO Box 53039 Oklahoma City OK 73152	Alabama Department of Revenue PO Box 32720 Montgomery AL 63132-7320	Delaware Dept of State PO Box 898 Dover DE 19903-0898
IRS PO Box 219690 Kansas City MO 64121-9690	Kansas Dept of Labor 401 SW Topeka Blvd Topeka KS 66603-3182	Kansas Dept of Revenue PO Box 12005 Topeka KS 66601-3005
Louisiana Dept of Revenue PO Box 751 Baton Rouge LA 70821-0751	Missouri Dept of Revenue PO Box 3375 Jefferson City MO 65102	Nebraska Dept of Revenue PO Box 98912 Lincoln NE 68509-8912
NY State Dept of Taxation PO Box 5300 Albany NY 12205-0300	Oklahoma Sec of State 2300 N Lincoln Blvd Room 101 Oklahoma City OK 73105	Oklahoma Tax Commission 100 N. Broadway Suite 1500 Oklahoma City OK 73102
Oklahoma Employment Security Commission PO Box 52003 Oklahoma City OK 73152	West Virginia Dept of Commerce Capitol Complex Bldg 6 Room 525 Charleston WV 25305-0311	West Virginia State Tax Dept 1206 Quarrier Street Charleston WV 25301-1810

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West Virginia State Tax Dept 1001 Lee Street East Charleston WV 25301-1725

/s/ Stephen J. Moriarty
Stephen J. Moriarty

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